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COMPONENTS (THAILAND) CO., LTD., and
Defendants AGILIS INC. and AGILIS
TECHNOLOGY INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NIDEC CORPORATION

Plaintiff,

v.

VICTOR COMPANY OF JAPAN, LTD., JVC
COMPONENTS (THAILAND) CO., LTD.,
KABUSHIKI KAISHA AGILIS, and AGILIS
TECHNOLOGY INC.,

Defendants.

Case No. C05 00686 SBA

**STIPULATION AND ORDER
REGARDING JVC'S DISCLOSURE
OF THIRD-PARTY DISCOVERY
FROM SEAGATE**

Pursuant to Civil L.R. 7-12 of the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California, the Defendants VICTOR COMPANY OF JAPAN, LTD., JVC COMPONENTS (THAILAND) CO., LTD., KABUSHIKI KAISHA AGILIS, and AGILIS TECHNOLOGY INC. (collectively, "JVC"), and non-party SEAGATE TECHNOLOGY ("Seagate") stipulate to an order providing the following:

BACKGROUND

A. On September 21, 2005, the Court entered a Stipulated Protective Order ("the Protective Order") (D.I. 50).

B. Pursuant to subpoena, Seagate has produced to counsel for JVC and Nidec certain Protected Material, as defined under the Protective Order, and may produce additional Protected Material in the future (collectively, "the Seagate Protected Material").

C. Pursuant to Paragraph 7.4 of the Protective Order, JVC disclosed to Seagate the names of its experts and consultants at CRA International ("CRA"), namely, David Haas, John Hayes, Eric Phillips and Andrew Zrust ("the CRA Experts"), to whom JVC sought to disclose the Seagate Protected Material.

D. Following Seagate's initial objection to such disclosure, JVC and Seagate reached the following agreement that would enable JVC to make such disclosure.

STIPULATION

1. Seagate consents to the disclosure of the Seagate Protected Material by JVC to the CRA Experts, subject to the restrictions set forth in the Protective Order and the following additional restrictions.

2. CRA shall set up an ethical wall such that any individual at CRA who is currently involved in the litigation of *Convolve, Inc., et al. v. Compaq Computer Corp, et al.*, No. 1:00-cv-05141-GBD-JCF (S.D.N.Y. filed July 13, 2000) ("the Convolve Action") will be ethically walled from the above-captioned Action.

3. The CRA Experts or any other person at CRA who will have access to the Seagate Protected Material shall not participate in the Convolve Action in any manner and shall be formally walled from CRA's work in the Convolve Action.

STIPULATION AND ORDER REGARDING JVC'S DISCLOSURE OF THIRD-PARTY DISCOVERY FROM SEAGATE C 05-00686 SBA

4. Only two hard copies of the Seagate Protected Material shall be provided to the CRA Experts, one hard copy to be provided to the CRA Experts located in Chicago and the other hard copy to be provided to the CRA Experts located in Oakland. The CRA Experts shall not make any additional copies of the Seagate Protected Material and shall store the Seagate Protected Material in a secure place that cannot be accessed by anyone involved in the Convolv Action.

5. The CRA Experts shall certify that they have read this Stipulation and Order and agree to comply with and be bound by it.

Dated: March __, 2007

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Dated: March 9, 2007

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: March 13, 2007



EDWARD M. CHEN
UNITED STATES MAGISTRATE JUDGE

STIPULATION AND ORDER REGARDING JVC'S DISCLOSURE OF THIRD-PARTY DISCOVERY FROM SEAGATE C 05-00686 SBA